

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC. , THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
and JANE DOES 1 through 5,

Defendants.

Civil Action
No. 04-10535-PBS

**JOINT MOTION TO COMPEL CERTAIN DOCUMENTS FROM THE OFFICE
OF THE ATTORNEY GENERAL FOR THE COMMONWEALTH OF
MASSACHUSETTS**

Pursuant to the Court's request made at the February 10, 2005 hearing in this matter, the parties submit this joint motion requesting the Court to order the Attorney General for the Commonwealth of Massachusetts (Attorney General) to produce all documents within the scope of the August 20, 2004 subpoena served by Shareholder.com, with the exception of documents containing internal attorney communications or attorney work-product. Following court-ordered consultation, the parties now agree that the attached Proposed Order should issue. Accordingly, this motion supersedes Shareholder.com's Motion to Compel Certain Documents From the Office of the Attorney General for the Commonwealth of Massachusetts filed on December 23, 2004 (Docket No. 47).

As explained in Shareholder.com's original motion and supporting memorandum (Docket Nos. 47 & 48), the Attorney General does not oppose this motion, but will only release the documents pursuant to a court order.

Wherefore, the parties respectfully request that this Court enter the attached Proposed Order.

<p>GOODWIN PROCTER LLP</p> <p><u>/s/ Anthony S. Fiotto (MA)</u> Anthony S. Fiotto (BBO #558089) David M. Moss (BBO #649707)</p> <p>Exchange Place Boston, MA 02109-2881 (617) 570-1000</p> <p><i>Counsel for Defendants</i></p>	<p>PALMER & DODGE LLP</p> <p><u>/s/ John T. Bennett</u> Thane D. Scott (BBO #449340) Ruth T. Dowling (BBO #645568) John T. Bennett (BBO #648464)</p> <p>111 Huntington Avenue Boston, MA 02199 (617) 239-0100</p> <p><i>Counsel for Plaintiff</i></p>
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SO ORDERED:

Honorable Joyce London Alexander
United States Magistrate Judge

Dated: _____

Boston, Massachusetts